



Iowa department of environmental quality

reply to: Joe P. Sanfilippo - R.O. #1
phone: 319-927-2640

November 23, 1982

Mr. Craig W. Smith, P.E.
U.S. Environmental Protection Agency
25 Funston Road
Kansas City, Kansas 66115

Dear Craig:

Enclosed are the inspection reports for Square D and [REDACTED]
[REDACTED] The report for [REDACTED] should be
following shortly. If you have any questions concerning the
reports, please feel free to contact me.

edited text is non-
responsive.

It was a pleasure to do the joint inspections with you. Stop
by again if you are ever in the Manchester area.

Sincerely,

Joe P. Sanfilippo
Environmental Specialist

JPS:mc

Encs.

cc: Air/Land Quality Division - DEQ - Des Moines



R00352656
RCRA RECORDS CENTER

Main Office: Henry A. Wallace Building, Des Moines, Iowa 50319

Regional Office #1
209 N. Franklin St.
Manchester 52057

Regional Office #2
509 S. President
P.O. Box 1443
Mason City 50401

Regional Office #3
401 Grand Ave.
P.O. Box 270
Spencer 51301

Regional Office #4
316 Walnut
Atlantic 50022

Regional Office #5
317 E. 5th St.
P.O. Box 6160
Des Moines 50309

Regional Office #6
117 N. 2nd Ave.
P.O. Box 27
Washington 52353

IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

Report Of Investigation

Page 1 Of 4

INVESTIGATION DATE Current <u>11-17-82</u> Last _____		FROM: DEPT. OF ENVIRONMENTAL QUALITY (Use Stamp) REGION NO. 1 209 NORTH FRANKLIN MANCHESTER, IOWA 52057 PHONE 319/927-2640
TO: (Facility Name, Location & Address) Square D Company 3700 Sixth St., SW Cedar Rapids, Iowa 52406 ATTN: Glenn A. Brock		
RE: (Specify Investigation Purpose Or Cite Rule) RCRA Hazardous Waste Inspection IAD 000819110		Persons Contacted (Name & Position) Glenn Brock, Manager, Fabrication Terry Mammel, Square D Marv Eiman, Square D Al Rickard, Square D Dick Kelley, Square D Craig Smith, P.E., U.S. EPA, Kansas City

OBSERVATIONS/RECOMMENDATIONS

The Square D Company in Cedar Rapids is in the business of manufacturing circuit breakers for industrial use. Hazardous waste is generated in two different waste streams at the plant. One is from the electroplating processes, which run through a small treatment facility, with non-hazardous materials being discharged to the city, and the hazardous sludge being bagged for shipment to a hazardous waste landfill in Missouri. The other waste generated is solvent from clean-up. The facility fits into the generator without storage requirement as they ship out their hazardous waste within 90 days of accumulation. The following is a completed checklist with only one deficiency noted. This was discussed with plant personnel during the inspection and will be corrected shortly.

I would like to thank Glenn Brock and the rest of the Square D personnel for their assistance during this inspection.

JPS:mc

SUSPENSE DATE	Signature	Date
<u>11</u>	Inspector Joe P. Sanfilippo	<u>11/23/82</u>
	Regional Administrator Environmental Specialist Ron Stellick	<u>11-24-82</u>
Enclosures (Specify)		
Distribution: Regional Office: Central Office: Inspected Facility Date Copy Mailed: 11-24-82 <i>mc</i>		

RP-5 (8-79)

cc: Craig W. Smith, EPA, 25 Funston Rd.,
 Kansas City, Kansas 66115
 Don Sandifer, EPA, 324 E. 11th St.,
 Kansas City, Mo. 64106

IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

SANITARY LANDFILL INSPECTION ☐

WATER SUPPLY INSPECTION ☐

WASTEWATER TREATMENT FACILITY INSPECTION ☐

AIR QUALITY INSPECTION ☐

HAZARDOUS WASTE INSPECTION ☒

Page 2 of 4

Facility/Permit # _____

IAD

0	0	0	8	1	9	1	1	0
---	---	---	---	---	---	---	---	---

ITEM CODE	COMMENTS AND RECOMMENDATIONS
2.A. (2)	<p><u>Training Records</u></p> <p>40 CFR 265.16(e). Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least 3 years from the day the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company. Page 33236 of May 19, 1980 Federal Register.</p> <p>Plant personnel have been adequately informed of the proper handling procedures of hazardous waste and instructed on their contingency plan. However, no record of the training has been kept on file. Glenn Brock agreed that in the future Square D Company will keep a record, which will be signed by all employees who have taken the company training program for hazardous waste.</p>

Company Name Square DDate of Inspection 11-17-82IAD

0	0	0	8	1	9	1	1	0
---	---	---	---	---	---	---	---	---

HAZARDOUS WASTE GENERATOR
General Administrative Requirements
Site Inspection Report Checklist

Instruction
Answer and Explain
as Necessary

1. Manifest [40 CFR 262.21, 262.22 & 262.23 as Incorporated in 400-45 (455B) I.A.C.]

☒ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

2. Short Term Storage (262.34)

☒ Applicable ☐ Not Applicable

A. Personnel Training (265.16)

(1) Position Descriptions(2) Training Records

1	
---	--

 Adequate

--	--

 More Effort Required

2	
---	--

 Inadequate

B. Preparedness and Prevention Procedures (265.30 & 265.31)

(1) Required Equipment (254.32) and (2) Testing and Maintenance of Equipment (265.33)

X	X
---	---

 Adequate

--	--

 More Effort Required

--	--

 Inadequate

--	--

 Not Applicable

(3) Access to Communications or Alarm Systems (265.34) and (4) Required Aisle Space (265.35)

X	X
---	---

 Adequate

--	--

 More Effort Required

--	--

 Inadequate

--	--

 Not Applicable

(5) Arrangements with Local Authorities (265.37)

X	
---	--

 Adequate

--	--

 More Effort Required

--	--

 Inadequate

--	--

 Not Applicable

C. Emergency Procedures (265.56)

(1) Contingency Plan (265.52) and (2) Instruction on Contingency Plan

X	X
---	---

 Adequate

--	--

 More Effort Required

--	--

 Inadequate

3. Recordkeeping (262.40) and Annual Report (262.41)

☒ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

Company Name Square DDate of Inspection 11-17-82IAD

0	0	0	8	1	9	1	1	0
---	---	---	---	---	---	---	---	---

SHORT TERM STORAGE SITE INSPECTION REPORT CHECKLIST
4 (Containers)

Instruction
Answer and Explain
as Necessary

A. Condition of Container (265.171)

☒ Adequate ☐ More Effort Required ☐ Inadequate

B. Inspections (265.174)

☒ Adequate ☐ More Effort Required ☐ Inadequate

C. Special Requirements for Ignitable or Reactive Waste (265.176)

☒ Adequate ☐ More Effort Required ☐ Inadequate

D. Labeling/Marking on Containers (262.31, 32, 34)

☒ Adequate ☐ More Effort Required ☐ Inadequate

SHORT TERM STORAGE SITE INSPECTION REPORT CHECKLIST
5 (Tanks)

Instruction
Answer and Explain
as Necessary

A. Condition of Tanks (265.192)

☒ Adequate ☐ More Effort Required ☐ Inadequate

B. Uncovered Tank Requirement (265.192)

☒ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

C. Tank with Continuous Feed Requirement (265.192)

☒ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

D. Inspections

☒ Adequate ☐ More Effort Required ☐ Inadequate

E. Special Requirement for Ignitable or Reactive Waste

☐ Adequate ☐ More Effort Required ☐ Inadequate ☒ Not Applicable

8A



IAD000819110

iowa department of environmental quality

reply to: Joe P. Sanfilippo - R.O. #1
phone: 319-927-2640

November 23, 1982

Mr. Craig W. Smith, P.E.
U.S. Environmental Protection Agency
25 Funston Road
Kansas City, Kansas 66115

Dear Craig:

Enclosed are the inspection reports for Square D and [REDACTED]

edited text is
non-
responsive.

[REDACTED] The report for [REDACTED] should be following shortly. If you have any questions concerning the reports, please feel free to contact me.

It was a pleasure to do the joint inspections with you. Stop by again if you are ever in the Manchester area.

Sincerely,

Joe P. Sanfilippo
Environmental Specialist

JPS:mc

Encs.

cc: Air/Land Quality Division - DEQ - Des Moines

Main Office: Henry A. Wallace Building, Des Moines, Iowa 50319

Regional Office #1
209 N. Franklin St.
Manchester 52057

Regional Office #2
509 S. President
P.O. Box 1443
Mason City 50401

Regional Office #3
401 Grand Ave.
P.O. Box 270
Spencer 51301

Regional Office #4
316 Walnut
Atlantic 50022

Regional Office #5
317 E. 5th St.
P.O. Box 6160
Des Moines 50309

Regional Office #6
117 N. 2nd Ave.
P.O. Box 27
Washington 52353

IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

Report Of Investigation

Page 1 Of 4

INVESTIGATION DATE Current <u>11-17-82</u> Last _____	FROM: DEPT. OF ENVIRONMENTAL QUALITY (Use Stamp) REGION NO. 1 209 NORTH FRANKLIN MANCHESTER, IOWA 52057 PHONE 319/927-2640
TO: (Facility Name, Location & Address) Square D Company 3700 Sixth St., SW Cedar Rapids, Iowa 52406 ATTN: Glenn A. Brock	Persons Contacted (Name & Position) Glenn Brock, Manager, Fabrication Terry Mammel, Square D Marv Eiman, Square D Al Rickard, Square D Dick Kelley, Square D Craig Smith, P.E., U.S. EPA, Kansas City
RE: (Specify Investigation Purpose Or Cite Rule) RCRA Hazardous Waste Inspection IAD 000819110	

OBSERVATIONS/RECOMMENDATIONS

The Square D Company in Cedar Rapids is in the business of manufacturing circuit breakers for industrial use. Hazardous waste is generated in two different waste streams at the plant. One is from the electroplating processes, which run through a small treatment facility, with non-hazardous materials being discharged to the city, and the hazardous sludge being bagged for shipment to a hazardous waste landfill in Missouri. The other waste generated is solvent from clean-up. The facility fits into the generator without storage requirement as they ship out their hazardous waste within 90 days of accumulation. The following is a completed checklist with only one deficiency noted. This was discussed with plant personnel during the inspection and will be corrected shortly.

I would like to thank Glenn Brock and the rest of the Square D personnel for their assistance during this inspection.

JPS:mc

SUSPENSE DATE	Signature	Date
<u>11</u>	Inspector Joe P. Sanfilippo	11/23/82
	Regional Administrator Ron Stellick	11-24-82
Enclosures (Specify)		
Distribution: Regional Office: Central Office: Inspected Facility Date Copy Mailed: <u>11-24-82</u> <i>mc</i>		

RP-5 (8-79)

cc: Craig W. Smith, EPA, 25 Funston Rd.,
 Kansas City, Kansas 66115
 Don Sandifer, EPA, 324 E. 11th St.,
 Kansas City, Mo. 64106

IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

SANITARY LANDFILL INSPECTION ☐

Page 2 of 4

WATER SUPPLY INSPECTION ☐

WASTEWATER TREATMENT FACILITY INSPECTION ☐

Facility/Permit # _____

AIR QUALITY INSPECTION ☐

HAZARDOUS WASTE INSPECTION ☒

IAD

0	0	0	8	1	9	1	1	0
---	---	---	---	---	---	---	---	---

ITEM CODE	COMMENTS AND RECOMMENDATIONS
2.A.(2)	<p><u>Training Records</u></p> <p>40 CFR 265.16(e). Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least 3 years from the day the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company. Page 33236 of May 19, 1980 Federal Register.</p> <p>Plant personnel have been adequately informed of the proper handling procedures of hazardous waste and instructed on their contingency plan. However, no record of the training has been kept on file. Glenn Brock agreed that in the future Square D Company will keep a record, which will be signed by all employees who have taken the company training program for hazardous waste.</p>

Company Name Square DDate of Inspection 11-17-82IAD

0	0	0	8	1	9	1	1	0
---	---	---	---	---	---	---	---	---

HAZARDOUS WASTE GENERATOR
General Administrative Requirements
Site Inspection Report Checklist

Instruction
Answer and Explain
as Necessary

1. Manifest [40 CFR 262.21, 262.22 & 262.23 as Incorporated in 400-45 (455B) I.A.C.]

☒ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

2. Short Term Storage (262.34)

☒ Applicable ☐ Not Applicable

A. Personnel Training (265.16)

(1) Position Descriptions(2) Training Records

☒ Adequate ☐ More Effort Required ☒ Inadequate

B. Preparedness and Prevention Procedures (265.30 & 265.31)

(1) Required Equipment (265.32) and (2) Testing and Maintenance of Equipment (265.33)

☒ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

(3) Access to Communications or Alarm Systems (265.34) and (4) Required Aisle Space (265.35)

☒ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

(5) Arrangements with Local Authorities (265.37)

☒ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

C. Emergency Procedures (265.56)

(1) Contingency Plan (265.52) and (2) Instruction on Contingency Plan

☒ Adequate ☐ More Effort Required ☐ Inadequate

3. Recordkeeping (262.40) and Annual Report (262.41)

☒ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

Company Name Square DDate of Inspection 11-17-82IAD

0	0	0	8	1	9	1	1	0
---	---	---	---	---	---	---	---	---

SHORT TERM STORAGE SITE INSPECTION REPORT CHECKLIST
4 (Containers)

Instruction
Answer and Explain
as Necessary

A. Condition of Container (265.171)

☒ Adequate☐ More Effort Required☐ Inadequate

B. Inspections (265.174)

☒ Adequate☐ More Effort Required☐ Inadequate

C. Special Requirements for Ignitable or Reactive Waste (265.176)

☒ Adequate☐ More Effort Required☐ Inadequate

D. Labeling/Marking on Containers (262.31, 32, 34)

☒ Adequate☐ More Effort Required☐ Inadequate

SHORT TERM STORAGE SITE INSPECTION REPORT CHECKLIST
5 (Tanks)

Instruction
Answer and Explain
as Necessary

A. Condition of Tanks (265.192)

☒ Adequate☐ More Effort Required☐ Inadequate

B. Uncovered Tank Requirement (265.192)

☒ Adequate☐ More Effort Required☐ Inadequate☐ Not Applicable

C. Tank with Continuous Feed Requirement (265.192)

☒ Adequate☐ More Effort Required☐ Inadequate☐ Not Applicable

D. Inspections

☒ Adequate☐ More Effort Required☐ Inadequate

E. Special Requirement for Ignitable or Reactive Waste

☐ Adequate☐ More Effort Required☐ Inadequate☒ Not Applicable